

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

- (1) BARRY J. CADDEN
- (2) GLENN A. CHIN
- (3) GENE SVIRISKIY
- (4) CHRISTOPHER M. LEARY
- (5) JOSEPH M. EVANOFSKY
- (6) SCOTT M. CONNOLLY
- (7) SHARON P. CARTER
- (8) ALL V. STEPANETS
- (9) GREGORY A. CONIGLIARO
- (10) ROBERT A. RONZIO
- (11) KATHY S. CHIN
- (12) MICHELLE L. THOMAS
- (13) CARLA R. CONIGLIARO
- (14) DOUGLAS A. CONIGLIARO

14-CR-10363-RGS

**THE PLAINTIFFS' STEERING COMMITTEE'S
MOTION FOR NOTICE AND OPPORTUNITY TO BE HEARD ON BEHALF OF
TORT VICTIMS OF THE NEW ENGLAND COMPOUNDING PHARMACY DISASTER**

Now comes the Plaintiffs' Steering Committee ("PSC") appointed in the related civil multidistrict litigation, *In Re New England Compounding Pharmacy, Inc. Products Liability Litigation*, No. 13-md-2419 (J. Zobel), pursuant to the Mandatory Victim Rights Act ("MVRA"), 18 U.S.C. § 3663A, and the Crime Victim Rights Act ("CVRA"), 18 U.S.C. § 3771, and moves for relief on behalf of individual plaintiff-victims injured as a direct and proximate cause of the crimes being prosecuted in this proceeding.

The PSC respectfully asks this Court for an order (i) granting notice to the PSC, via the Court's electronic notification system ("ECF"), of all public court proceedings in this action, (ii) ordering the parties to these proceedings to provide (when, as, and if ever relevant) a meaningful opportunity for the PSC and victims to be consulted before decision-making on the issue of restitution in connection with any plea arrangements that may be proposed by the parties, and (iii) providing notice and an opportunity to be heard in connection with any change of plea and/or post-conviction sentencing, including an opportunity to further brief or argue the issues of restitution at an appropriate time.

The grounds supporting these requests are set forth in the accompanying memorandum.

A proposed order is attached as Exhibit A.

Dated: July 17, 2015

Respectfully submitted,

/s/ Thomas M. Sobol

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Members of the Plaintiffs' Steering Committee

CERTIFICATE OF SERVICE

I, Thomas M. Sobol, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Dated: July 17, 2015

/s/ Thomas M. Sobol

Thomas M. Sobol, BBO # 471770